

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
VICTORVILLE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	COURT CASE NO. FVI1000504
	)	
Plaintiff	)	SECOND AMENDED
	)	
vs.	)	FELONY COMPLAINT
	)	
William Edward Lewis	)	
	)	
Defendant	)	DA CASE NO. 2010-00-0012348
	)	

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The undersigned is informed and believes that:

COUNT 1

On or about March 6, 2010, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by William Edward Lewis, who did unlawfully, and with malice aforethought murder Angelina Goffredo , a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally and intentionally discharged a firearm, a handgun, which caused great bodily injury and death to Angelina Goffredo within the meaning of Penal Code Section 12022.53(d) also causing

the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code Section 12022.53(c) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally used a firearm, a handgun, within the meaning of Penal Code Section 12022.53(b) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

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## COUNT 2

On or about March 6, 2010, in the above named judicial district, the crime of MURDER OF HUMAN FETUS, in violation of PENAL CODE SECTION 187(a), a felony, was committed by William Edward Lewis, who did unlawfully, and with malice aforethought murder a human fetus.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally and intentionally discharged a firearm, a handgun, which caused great bodily injury and death to Angelina Goffredo within the meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code Section 12022.53(c) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged as to count(s) 1, 2 that said defendant(s) William Edward Lewis personally used a firearm, a handgun, within the meaning of Penal Code Section 12022.53(b) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

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### COUNT 3

On or about December 15, 2009, in the above named judicial district, the crime of ASSAULT WITH DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by William Edward Lewis, who did willfully and unlawfully commit an assault upon Angelina Goffredo with a deadly weapon, to wit, Handgun.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

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#### COUNT 4

On or about December 15, 2009, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION 422, a felony, was committed by William Edward Lewis, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Amanda Quinn , with the specific intent that the statement be taken as a threat.

It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to Amanda Quinn a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said Amanda Quinn was reasonably in sustained fear of his/her safety and the safety of his/her immediate family.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

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#### COUNT 5

On or about January 23, 2010, in the above named judicial district, the crime of ASSAULT WITH DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by William Edward Lewis, who did willfully and unlawfully commit an assault upon Amanda Quinn with a deadly weapon, to wit, Handgun.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

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#### COUNT 6

On or about January 23, 2010, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION 422, a felony, was committed by William Edward Lewis, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Amanda Quinn , with the specific intent that the statement be taken as a threat.

It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to Amanda Quinn a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said Amanda Quinn was reasonably in sustained fear of his/her safety and the safety of his/her immediate family.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 6 COUNT(S).

Executed at Victorville, California, on September 3, 2010.

Steven P. Sinfield

Steven P. Sinfield

DECLARANT AND COMPLAINANT

Agency: Victor Valley Sheriff Station

Prelim Est. 00:00

Defendant

William Edward Lewis

Birth Date

11/17/1986

Booking No.

CII No.

A27869815

NCIC